

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
)
4. NOE SALVADOR PEREZ VASQUEZ)
a/k/a "CRAZY,")
)
15. LUIS SOLIS VASQUEZ)
a/k/a "BRUJO,")
)
20. HECTOR ENAMORADO)
a/k/a "VIDA LOCA")
)
Criminal No. 15-10338-FDS

GOVERNMENT'S PROPOSED JURY INSTRUCTIONS AND VERDICT FORM

Now comes the United States, through counsel, and respectfully submits the attached proposed jury instruction and proposed verdict form. The government will continue to revise and if necessary amend these documents.

The government's proposed jury instructions are substantially similar to the Court's instructions at the so-called Group Three MS-13 trial in January-February 2018. The government's proposed instructions made substantive changes to or deleted the instructions set out below (this does not include minor changes such as substituting the names and aliases of the defendants):

- Elements of the Crime: Introduction
- Consider Each Defendant and Each Count Separately
- Count Two-First Element-Agreement Charged in the Indictment
- Count Two-Third Element-Racketeering Acts-Crimes Charged
- Count Two-Third Element-Racketeering Acts-Federal and Massachusetts Law
- Count Two-Third Element-Non-Racketeering Acts-Federal and Massachusetts Law
- Count Three-First Element-Agreement Charged in the Indictment
- Count Three-Drug Quantity

In addition, the government's proposed instructions includes the following additional instructions:

- Count Four-Possession of a Firearm in Furtherance of a Drug Trafficking Offense
- Count Eleven-Conspiracy to Possess With Intent to Distribute and to Distribute Marijuana

The government's proposed verdict form differs from the verdict form utilized in the Group Three trial due to the nature of the charges against the defendants in this case.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Christopher Pohl
CHRISTOPHER POHL
KELLY BEGG LAWRENCE
GLENN A. MACKINLAY
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Court's Electronic Court Filing (ECF) system on April 12, 2018 be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

By: /s/ Christopher Pohl
CHRISTOPHER POHL
Assistant United States Attorney